

1 Jeffrey Lewis (SBN 66587)
2 KELLER ROHRBACK L.L.P.
3 180 Grand Avenue, Suite 1380
4 Oakland, CA 94612
5 Phone (510) 463-3900
6 Fax (510) 463-3901
jlewis@kellerrohrback.com

7
8 Attorneys for Plaintiffs
9 (Additional Attorneys Listed on Signature Page)

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SPENCER LYBROOK, ALEC ENGLISH,
MICHAEL WATSON, and CODY HILL,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC, ROBINHOOD
SECURITIES, LLC, and ROBINHOOD
MARKETS, INC.,

Defendants.

No. 4:21-cv-01596

**NOTICE OF MOTION AND MOTION
FOR WITHDRAWAL OF COUNSEL
MAXWELL H. GIONS ON BEHALF OF
PLAINTIFFS AND REMOVAL FROM
CM/ECF SERVICE LIST**

DATE: MAY 5, 2022

TIME: 9:00 A.M.

Judge: Haywood S. Gilliam, Jr.

TO THE CLERK OF COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that, on May 5, 2022, or as soon thereafter as the matter may be
heard before the Honorable Haywood S. Gilliam, Jr., without oral argument, Maxwell H. Goins of
Keller Rohrback LLP, 12021 Third Avenue, Suite 3200, Seattle, WA 98101, shall and hereby does
respectfully seek leave of this Court, pursuant to LOCAL R. 11-5(a) and in compliance with CAL. R.
PROF. CONDUCT 3-700, to withdraw as counsel for Plaintiffs in this case.

MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFFS

Pursuant to LOCAL R. 11-5, Maxwell H. Goins ("Movant") hereby notifies the parties and the

1 Court of his intent to withdraw as counsel pro hac vice for Plaintiffs. Movant states the following
2 grounds for this notice and motion:

3 This Court granted Movant leave to appear pro hac vice in this action pursuant to its March 15,
4 2021 Order, ECF 16.

5 Movant has represented Plaintiffs as part of his employment at Keller Rohrback LLP.
6 However, Maxwell H. Goins is no longer employed with Keller Rohrback LLP.

7 All other attorneys at Keller Rohrback remain as counsel of record for Plaintiffs. Mr. Goins
8 also requests to be removed from the CM/ECF service list for the instant action.

9 Given the Standing Order Regarding COVID-19 Procedures, Movant respectfully requests that
10 the Court waive oral argument. THEREFORE, Movant Maxwell H. Goins respectfully requests that
11 this Court waive oral argument on this Motion, grant him leave to withdraw as counsel pro hac vice in
12 the above-captioned matter, and enter an order stating that Movant has so withdrawn.

13 REPSECTFULLY SUBMITTED this 31st day of March, 2022.

14 KELLER ROHRBACK L.L.P.

15 By: s/ Maxwell H. Goins

16 Maxwell Goins (*pro hac vice*)
17 Gretchen Freeman Cappio (*pro hac vice*)
18 Ryan McDevitt (*pro hac vice*)
19 1201 Third Avenue, Suite 3200
20 Seattle, WA 98101-3052
21 Phone: (206) 623-1900
22 Fax: (206) 623-3384
23 mgoins@kellerrohrback.com
24 gcappio@kellerrohrback.com
25 rmcdevitt@kellerrohrback.com
26 mgoins@kellerrohrback.com

27 Jeffrey Lewis (SBN 66587)
28 KELLER ROHRBACK L.L.P.
180 Grand Avenue, Suite 1380
Oakland, CA 94612
Phone: (519) 463-3900
Fax: (510) 463-3901
jlewis@kellerrohrback.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Maxwell H. Goins, hereby certify that on this 31st day of March, 2022, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Maxwell H. Goins
Maxwell H. Goins